

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

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In re: Sean T & Maria G Connor

Case No. 18-12941-13

Debtor(s)

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TRUSTEE'S OBJECTION TO MODIFIED CHAPTER 13 PLAN

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Mark Harring, Standing 13 Trustee, by his attorney, objects to confirmation of the Third Modified Chapter 13 Plan and Request to Modify Confirmed Plan filed as Document #114&#115 on 6/25/2024(superseding #113 filed 6/24/2024) and states as follows:

1. Plan is modified in an attempt to cure payment delinquency due to loss of employment. Unfortunately, Section II of the plan is drafted to require total plan payments of \$171,652.98 through June 2024 and total receipts are just \$165,079.20. Plan is then modified to propose plan payments of \$660/mo for two months, increasing to \$775/mo and then \$882/mo for the final months of an 84 month plan. The debtors have not filed an amended budget to support plan payments going forward.
2. As noted, the plan term continues to be 84 months as extended under the CARES Act. It is not clear to this office that such an extension may continue however since the plan has already lasted 70 months through June 2024 we are not set on arguing this point.
3. Plan continues to direct payment of a secured obligation due Veros Credit with a balance of \$5,100.65 and equal monthly payments of \$117/mo. We note an earlier modification provided for surrender of the collateral and directed no additional payments. We assume that continues to be the debtors' intent at this time.
4. In passing we note, based on the new plan language, that this office will pay the \$1824.50 Post Petition Fee Notice filed by Rushmore Loan Management.
5. As the initial filing, Document #113, was timely filed, the 6/10/2024 Court Order is resolved.

Dated: July 10, 2024

Standing Chapter 13 Trustee

By: /s/ *Leslie Brodhead Griffith*

Leslie Brodhead Griffith  
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